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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

COMMUNITY ASSOCIATION FOR
RESTORATION OF THE
ENVIRONMENT, INC., a Washington
Non-Profit Corporation

and
CENTER FOR FOOD SAFETY, INC.,
a Washington D.C. Non-Profit
Corporation,

Plaintiffs,

v.

GEORGE & MARGARET, LLC, a
Washington Limited Liability Company,
and

GEORGE DeRUYTER & SON DAIRY,
LLC, a Washington Limited Liability
Company,

and
D&A DAIRY and D&A DAIRY LLC, a
Washington Limited Liability Company,
Defendants

Case No.: 2:13-CV-3017-TOR

STIPULATED LIMITED
PROTECTIVE ORDER

1 Pursuant to Federal Rule of Civil Procedure 26, it is hereby stipulated by and
2 between the Parties through their respective counsel and Ordered that the following
3 Stipulated Limited Protective Order for expedited delivery of financial information be
4 entered to give effect to the terms and conditions set forth below.

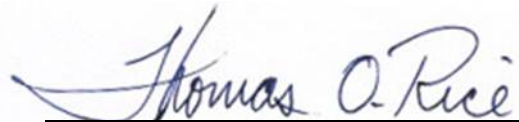
5 1. Except for receipt of public or quasi-public funds, all financial information
6 produced by Defendants on May 7, 2020 and BATES LABELED DeRuyter000001-
7 000018 (hereafter, the “Documents”) is hereby designated and marked as
8 ATTORNEYS’ EYES ONLY. As such, the Documents shall only be viewed by
9 Plaintiffs’ counsel and not shared with any other persons or entities without prior
10 consent of Defendants or order of the Court.

11 2. The Parties further agree that Plaintiffs shall not submit any of the
12 Documents to the Court, or use any of the Documents in open court, unless and until the
13 following has occurred:

- 14 a. Plaintiffs notify Defendants’ counsel at least 3 days in advance of the
15 submission date of their intent to submit any Documents marked
16 ATTORNEYS’ EYES ONLY to the Court or use any Documents marked
17 ATTORNEYS’ EYES ONLY in open court; and
18 b. Plaintiffs have specifically identified in writing to Defendants at least 3 days
19 in advance of the submission date which Documents marked ATTORNEYS’
20 EYES ONLY they intend to submit or use; and
21 c. Defendants have agreed to the submission and use of Documents marked
22 ATTORNEYS’ EYES ONLY in open court; or
23
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- 1 d. Defendants have sought and obtained a ruling from the Court related to
2 Plaintiffs' obligation, if any, to submit some or all of the Documents under
3 seal; or
4 e. Defendants have failed to seek a ruling from the Court related to the sealing
5 of the Documents within 3 days of Plaintiffs' notification to Defendants as
6 set forth in Paragraphs 2(a) and 2(b) above.
7

8 ORDERED THIS 13th DAY of May 2020.

A handwritten signature in blue ink that reads "Thomas O. Rice". The signature is written in a cursive style with a long, sweeping underline.

Thomas O. Rice
Chief United States District Judge

1 JOINTLY SUBMITTED THIS 7TH DAY of MAY, 2020.

2 /s/ Charles M. Tebbutt

Charles M. Tebbutt (WSBA #47255)

3 Daniel C. Snyder, *pro hac vice*

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7 *Counsel for Plaintiffs*

8 STOKES LAWRENCE

9 VELIKANJE MOORE & SHORE.

10
11 By: /s/ Brendan V. Monahan

Brendan V. Monahan (WSBA #22315)

12 Mathew L. Harrington (WSBA #33276)

John-Philip J. Schroeder (WSBA #50536)

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